REMARKS

This Amendment, submitted in response to the Office Action dated September 6, 2007, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-15 are all the claims pending in the application.

I. Claim Rejections under 35 U.S.C. § 102

Claims 1, 2, 7-9 and 12-15 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Bannai et al. (U.S. Pub. No. 2003/0208525; hereinafter "Bannai").

Claim 1

Claim 1 recites:

> "A method for realizing an **end-to-end connection** between a client layer connected to a Resilient Packet Ring (RPR) network and a client layer connected to a Multi Protocol Label Switching (MPLS) network, the method comprising:
>
> interconnecting the RPR network and the MPLS network through a Transparent LAN Service (TLS) layer."

Bannai discloses a network 100 which includes a ring 102 interconnecting nodes 104, 106, 108 and 110. Transparent LAN services domains, such as domains A and B exist on the ring 102. See para. [0025]. A device of domain A may send a data packet to another device of domain A using MPLS protocol. See para. [0030]. As illustrated in Fig. 2, a network 200 includes rings 212, 214 and 102. A TLAN services domain may be within a single ring or across multiple rings. See para. [0034].

However, there is no teaching or suggestion of realizing an end-to-end connection between a client layer connected to a **Resilient Packet Ring (RPR) network** and a client layer connected to a **Multi Protocol Label Switching (MPLS) network**. Specifically, Applicant requests that the Examiner identify where the claimed Resilient Packet Ring (RPR) network and the claimed Multi Protocol Label Switching (MPLS) network is disclosed in the Bannai reference. Bannai appears to at most disclose, for example, a ring 102 having domains A or B which apply an MPLS protocol. There is no teaching or suggestion of realizing an end-to-end connection between a client layer connected to a Resilient Packet Ring (RPR) network and a client layer connected to a Multi Protocol Label Switching (MPLS) network, as claimed.

Further, there is no teaching or suggestion of interconnecting the RPR network and the MPLS network through a Transparent LAN Service (TLS) layer. Bannai discloses that transparent LAN services may be provided for each of the domains A and B of the ring 102. However, there is no teaching or suggestion of interconnecting the RPR network and the MPLS network through a Transparent LAN Service (TLS) layer, as claimed.

On page 7 of the Office Action, the Examiner asserts that para. [0030] of Bannai discloses that domain A may send a data packet to another endpoint device of domain A using MPLS protocol. However, Applicant notes that domain A is of ring 102, which the Examiner cites for teaching the claimed RPR network. Therefore, para. [0030] of Bannai discloses the sending of data packets within ring network 102. The Examiner refers to Fig. 2 stating that domain A of ring network 102 can send a packet to any user in domain A which is connected to WAN network 202 based on MPLS protocol through a TLS layer. The Examiner asserts that the

other members of domain A on the ring networks 212 and 214 can be considered part of the MPLS network with the destination MAC address from a source in ring network 102 is not found in an association table.

Applicant submits that ring networks 212, 214 and 102 appear to be of a same kind of network. There is no teaching or suggestion that ring networks 212, 214 and 102 are of different kinds of networks. Specifically, there is no teaching or suggestion that one of ring networks 212, 214 and 102 is an RPR network while another one of ring networks 212, 214 and 102 is a MPLS network. See para. [0025]. Bannai merely discloses the application of an MPLS protocol and does not disclose and MPLS network, as claimed.

Since Bannai does not disclose the claimed RPR network and MPLS network, Bannai does not teach or suggest interconnecting an RPR network and an MPLS network through a Transparent LAN Service (TLS) layer.

On page 4 of the Office Action, the Examiner refers to Fig. 4 of Bannai for disclosing the interconnecting of an RPR network and an MPLS network through a Transparent LAN Service (TLS) layer. Fig. 4 of Bannai discloses a node 108 of a ring 102. The node 108 includes system controller applications 402, a control plane framework 404, line card applications 406 and ring card applications 408. However, the node 108 is a component of the ring 102, which the Examiner is citing for teaching the claims RPR network. As node 108 is a component of ring 102 which is being cited for teaching the claimed RPR network, Applicant submits that the node 108 cannot consequently disclose an MPLS network.

For at least the above reasons, claim 1 should be deemed allowable. To the extent independent claim 8 recites similar elements, claim 8 and its dependent claims should be deemed allowable for at least the same reasons.

II. Claim Rejections under 35 U.S.C. § 103

Claims 3-4 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over by Bannai.

Claim 3 recites:

"...in the direction from RPR to MPLS:

encapsulating received client frames in TLS packets, indicating the final destination;

encapsulating the TLS packets in RPR packets and passing the encapsulated TLS packets to the MPLS network;

wherein the TLS packets become MPLS packets and travel in the MPLS network until the final destination;

in the direction from MPLS to RPR:

encapsulating received client frames in MPLS packets, indicating a Label Switched Path (LSP) that has to be followed up to the final destination;

switching the MPLS packets inside the MPLS network and then passing the switched MPLS packets to the TLS network, becoming TLS packets;

encapsulating the TLS packets in RPR packets and wherein the encapsulated PLS packets travel in the RPR network, until the final destination."

The Examiner concedes that the elements of claim 3 are not explicitly disclosed in Bannai, however, the Examiner asserts that Bannai provides a clear suggestion for performing the claimed steps. As indicated above, Bannai is not at all concerned with the interconnection

between an RPR network and an MPLS network. Consequently, Bannai is not at all concerned with the encapsulating and switching of packets from an RPR network to an MPLS network as claimed. Therefore, contrary to the Examiner's assertion, modifying Bannai to teach the claimed elements would not be obvious to one of skill in the art.

Further, the Examiner asserts that para. [0046] of Bannai teaches the claimed elements. However, the aspect of Bannai cited by the Examiner discloses that a TLS microcode 422 looks up a destination MAC address of an incoming packet in an association table. If the destination MAC address is not found in the association table, then the TLS microcode 422 appends to the incoming packet the broadcast MAC address and the multicast MPLS label of an associated TLS domain.

However, there is no teaching or suggestion regarding the transmission of packets in the direction from an RPR network to and MPLS network and vice versa, let alone any discussion regarding the encapsulation and switching of packets until reaching a final destination.

For at least the above reasons, claim 3 and dependent claim 4 should be deemed allowable.

III. Allowable Subject Matter

The Examiner has indicated that claims 5-6 and 10-11 contain allowable subject matter and would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. At the present time, Applicant has not rewritten claims 5, 6, 10 and 11 in independent form since Applicant believes claims 5, 6, 10 and 11 will be deemed

allowable, without amendment, by virtue of their dependency to claim 1 for at least the reasons set forth above.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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